

9.24.2020 Technical Meeting with Bayer, BASF, and Syngenta

RD section on Hooded Sprayers:

Q1: Definition: a nozzle fully covered but can expand to a very specific definition and qualification requirements to use. Reference 24C in GA for language that can be used to allow.

Q2: Cost: \$24000 per unit. Previously no incentives for growers to incur those costs.

EPA: What size boom is that for?

Bayer: 80ft, which we consider to be the most common size.

BASF: in 90s used directed hooded and lay-by sprayers to keep spray off crops, but moved to broadcast spraying because of speed and added GMO crop options. In GA this is being adapted again

EPA: Availability concerns considering that farmers have not been using these. Is there a supply of the hoods that could be made available and how quickly?

Bayer: In discussions with production companies, could produce 2000 before the next season. Custom applicators could purchase hooded sprayer and then spray farmer's fields for them. GA requires from July 15 to Oct 1

EPA: Difference between lay-by and hooded?

USGR: in GA 24C, lay by is when release point of sprayer is no more than 24 in above soil, so between the crop rows. Hooded is when nozzles are under hood and bottom of hood touch soil surface at all times.

Bayer: Hoods = over top of crop, lay-by and direct spray = between the rows. We will share some videos that help explain

EPA: In lay-by, the nozzles are down between the rows, but I've seen lay-by without hoods. Are you recommending lay-by with hood?

BASF: You could say hooded-broadcast spray, lay-by usually refers to before the canopy closes but the spray is between rows.

EPA: The lay-by sprayers don't use the technology for this DT OTT application right, since its only between rows?

BASF: No, because it is directed at the base of the plant.

EPA: I thought most lay-by sprayers were directed to the middle of space between rows

BASF: Lay-by refers to the timing, so you could have lay-by spray at the crop row from between the space.

EPA: We need to know what the language would look like exactly. There's a lot of uncertainty around what the terminology is. We need to be clear on exactly what you're proposing, because currently we are not clear on the proposal is or what the technology you mean is. (action item for companies)

Bayer: There is some language on the extendimax label that was submitted, but we'll work with other registrants to clarify that.

Q3: EPA is uncertain about the performance of hooded sprayers and performance variations between different hooded sprayers rigs.

Given that we need 95% confidence in anything related to ESA mitigation, this is a significant concern.

Bayer: There are studies available in the literature to demonstrate effectiveness and Bayer submitted a study to show this as well. Recent communication from EPA encouraging growers to reduce pesticide drift whenever possible and hooded sprayers would support this. This would encourage innovation in the area as well and Bayer is open to qualification process as well.

EPA: From what we can see, the literature is primarily for OTT broadcast hooded sprayer but nothing for lay-by or in row. Do you have any references for those?

Bayer: The key difference is the height above the row at which they're sprayed. But we can certainly provide references on that.

Q4: How do you potentially foresee incorporating the use of a hooded sprayer onto dicamba labels?

Will provide written responses to this and other questions

Final Action Items

Company Requests:

List of studies included in the VSI analysis

Assuming no CBI issues (10G confidentiality that companies can sort out amongst themselves)

List of counties that Ed presented today, confident and marginal counties

Phil and Ed to follow up

List of species in the confident counties and marginal counties

Will give as much as we can that doesn't require significant more work

Final number of counties to be included in ESA (within a week)

Technical follow up using 5% VSI with Bayer

EPA requests

Written responses to hooded sprayer questions

Timeframe for when to expect written responses re:hooded sprayer